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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: mkc SCANNED BY: [Signature] 6/16/2020

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
GRAND RAPIDS DIVISION

JEFFREY EARL ANDERSON

Plaintiff,

v.

CASE # _____

THE HONORABLE KENT D. ENGLE,

Defendant.

1:20-cv-547
Paul L. Maloney
United States District Judge

**CIVIL RIGHTS COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF WITH JURY DEMAND**

Comes now the above Plaintiff, Jeffrey Earl Anderson (hereinafter "Anderson" or "the Plaintiff"), *pro se*, and pursuant to 42 U.S.C. § 1983, respectfully files this Civil Rights Complaint for Declaratory and Injunctive Relief with Jury Demand, and states as follows:

I. INTRODUCTION

1.) The Plaintiff alleges that the Defendant, The Honorable Kent D. Engle, Ottawa County Circuit Court Judge, acted *ultra vires*, without proper jurisdiction and authority, and deprived the Plaintiff of rights secured by the United States Constitution as set forth below.

II. JURISDICTION

2.) Jurisdiction is proper in the United States District Court for the Western District of Michigan pursuant 28 U.S.C. § 1343(3) and 28 U.S.C.A. § 1331. This action is brought pursuant to 42 U.S.C § 1983 to redress the deprivation under color of law of Plaintiff's rights as secured by the United States Constitution.

III. VENUE

3.) Venue is proper in the Grand Rapids Division of the Western District of Michigan, pursuant to 28 U.S.C. § 1391(b)(1), in that the Western District of Michigan is “a judicial district in which any defendant resides” and (b)(2) in that the Western District of Michigan is “a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred”

IV. PARTIES

4.) The Plaintiff Jeffrey Earl Anderson is an individual and a citizen of the United States and Western District of Michigan and is otherwise *sui juris* before this Court.

5.) The Defendant Kent D. Engle, is a citizen of the United States and Western District of Michigan and is otherwise *sui juris* before this Court.

V. STATEMENT OF THE CASE

6.) Plaintiff is suing under Section 1983, a civil rights law that provides a remedy to persons who have been deprived of their federal constitutional and/or statutory rights under color of state law.

7.) Section 1983 states, in pertinent part:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress

8.) At the time of the occurrence of the claims giving rise to this Complaint, the Defendant, a sitting state circuit court judge, was acting under color of state law, but without proper authority and jurisdiction.

9.) It is alleged the Defendant, both in open court and outside the confines of court, made derogatory and discriminatory remarks about the Defendant such as *ad hominem* slurs and verbal personal attacks and expressions of dislike towards the Plaintiff.

10.) In his non-judicial capacity outside of the courtroom, the Defendant made biased and unfair remarks concerning the instant Plaintiff in the state court case the Defendant was adjudicating involving the Plaintiff.

11.) In 2014 the Defendant lied on the JOD and caused the Plaintiff irreparable harm.

12.) Outside of the confines of court, the present Defendant expressed an improper sexual fondness for Defendant Svitlana Anderson in the below state court case in which the instant Defendant Judge Engle presides and is adjudicating.

13.) The above acts occurred in relation to state case # 11-71347-DM, *Jeffrey Earl Anderson v. Svitlana Anderson*, in the 20th Judicial Circuit Court for the County of Ottawa, Michigan.

VI. CAUSES OF ACTION

FIRST CAUSE OF ACTION

(42 U.S.C. § 1983: VIOLATION OF DUE PROCESS AND FUNDAMENTAL FAIRNESS)

14.) Plaintiff incorporates by reference all preceding paragraphs as if fully restated here

15.) The Plaintiff alleges the Defendant, outside of his judicial authority and jurisdiction, violated the Plaintiff's right to substantive and procedural Due Process of Law and fundamental fairness, as applied to the states through the Fourteenth Amendment.

16.) It is alleged the Defendant has unlawfully discriminated against the Plaintiff as set forth in the above Statement of the Case.

VII. JURY DEMAND

17,) The Plaintiff requests trial by jury on all causes of action.

VIII. REQUEST FOR RELIEF

WHEREFORE, in consideration of the foregoing, the Plaintiff requests the Court declare that Judge Engle's acts deprived the Plaintiff of Due Process of Law and fundamental fairness as guaranteed by the United States Constitution and to enjoin Judge Engle from any further participation in state case # 11-71347-DM, *Jeffrey Earl Anderson v. Svitlana Anderson*, in the 20th Judicial Circuit Court for the County of Ottawa, Michigan and to rescind any and all of Judge Engle's acts, orders and rulings in said case as such acts, orders and rulings are alleged to have been founded on violations of the United States Constitution as set forth above .

Respectfully submitted,

/s/ Jeffrey Earl Anderson

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Plaintiff pro se

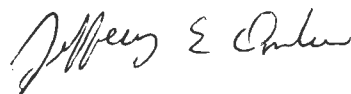
Please find enclosed two (2) copies of a Civil Complaint, a Civil Cover Sheet, a Summons, and my check for \$400 filing fee made out to Clerk of Court.

Please file this Complaint and return to me a filed copy in the stamped envelope provided.

Also, please certify the enclosed Summons and return to me for service.

My address is
Jeffrey E. Anderson
2495 Air Park Drive
Zeeland, MI 49464

Thank you.

A handwritten signature in cursive script, appearing to read "Jeffrey E. Anderson".

Jeffrey E. Anderson

